

District Judge Thomas S. Zilly

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

LEXINGTON INSURANCE COMPANY,  
PORT OF GRAYS HARBOR, AND  
ENDURIS,

Plaintiffs,

vs.

UNITED STATES OF AMERICA,  
UNITED STATES DEPARTMENT OF  
THE ARMY, UNITED STATES ARMY  
CORPS OF ENGINEERS, and MAB 6 UK,  
inclusive,

Defendants.

C20-05038 TSZ

STIPULATED MOTION FOR  
RELIEF FROM DEADLINES AND  
ORDER

Noted for Consideration:

December 28, 2020.

COMES NOW Plaintiffs, Lexington Insurance Company, Port of Grays Harbor, and Enduris, by and through their attorney, Zachary P. Marks, and Defendant, the United States of America, United States Department of the Army and the United States Army Corps of Engineers, by and through its counsel, Matt Waldrop (the “Parties”), and jointly request the Court enter an order vacating the remaining case deadlines and establishing a joint status report deadline of March

STIPULATED MOTION FOR RELIEF FROM DEADLINES  
AND ORDER [C20-05038 TSZ] 1

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1 29, 2021 for the parties to either finalize a settlement or provide the Court with a revised case  
2 schedule.

3 In support of this stipulated motion, the parties state that they are working on a release  
4 agreement for a settlement-in-principal and resetting the remaining case deadlines and establishing  
5 a joint status report deadline will allow that work to continue while deferring the cost and expense  
6 of litigation. Additionally, Plaintiffs are still attempting to serve Defendant MAB 6 UK.

7 The parties hereby jointly request the Court vacate the remaining case deadlines set forth  
8 in the Court's July 8, 2020 Minute Order (dkt. 33) and set a joint status report deadline for March  
9 29, 2021.

10 **SO STIPULATED.**

11  
12 Dated this 28<sup>th</sup> day of December, 2020.

13 *s/ Zachary P. Marks*

14 Zachary P. Marks, WSBA# 55693  
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21 Attorney for Plaintiffs

22 **SO STIPULATED.**

23 Dated this 28<sup>th</sup> day of December, 2020.

24 BRIAN T. MORAN  
25 United States Attorney

26 *s/ Matt Waldrop*

MATT WALDROP, Ga. Bar # 349571

Assistant United States Attorney

STIPULATED MOTION FOR RELIEF FROM DEADLINES  
AND ORDER [C20-05038 TSZ]2

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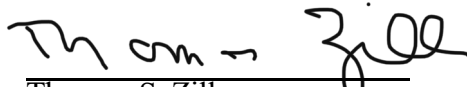
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Attorney for Defendant

**ORDER**

**IT IS SO ORDERED.**

Dated this 29 day of Dec, 2020.

  
\_\_\_\_\_  
Thomas S. Zilly  
United States District Judge